

1 DAVID J. COHEN, ESQ.  
California Bar No. 145748  
2 ALEXANDER P. GUILMARTIN, ESQ.  
California Bar No. 306767  
3 **BAY AREA CRIMINAL LAWYERS, PC**  
300 Montgomery Street, Suite 660  
4 San Francisco, CA 94104  
Telephone: (415) 398-3900

5 Attorneys for Defendant **Shaun A. Kirkpatrick**

6  
7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, )

Case No. 5:17-cr-00324-BLF (NMC)

11 Plaintiff, )

12 v. )

**STIPULATION TO MODIFY  
CONDITIONS OF RELEASE AND  
[PROPOSED] ORDER THEREON**

13 SHAUN ANTHONY KIRKPATRICK, )

14 Defendant. )  
15 \_\_\_\_\_)

16 **GOOD CAUSE APPEARING THEREFOR, IT IS HEREBY STIPULATED** by and  
17 between the parties that Mr. Kirkpatrick's conditions of pretrial release be modified so that he be  
18 permitted to travel to Jonesboro, Arkansas between November 16, 2017 and November 30, 2017 so  
19 that he can visit his significant other Felicia Wright. Ms. Wright is employed and is paying for Mr.  
20 Kirkpatrick's airfare. Mr. Kirkpatrick will be staying at Ms. Wright's residence for the entire  
21 duration of his trip. Ms. Wright's home address is 4718 Samantha Avenue, Jonesboro, Arkansas,  
22 72401.

23 Steven J. Sheehan is a Drug and Alcohol Treatment Specialist for United States Pretrial  
24 Services in the Eastern District of California and is supervising Mr. Kirkpatrick on pretrial release.  
25 Mr. Sheehan has communicated with ND/CA Pretrial Services and has stated that they have no  
26 objection to Mr. Kirkpatrick's travel request or to this modification.

1           **IT IS SO STIPULATED.**

2                           BRIAN J. STRETCH, ESQ.  
3                           United States Attorney

4   Dated: November 16, 2017

5                           By: /s/Marissa Harris  
6                           MARISSA HARRIS, ESQ.  
7                           Assistant United States Attorney  
8                           Attorneys for **Plaintiff**

9                           **BAY AREA CRIMINAL LAWYERS, PC**

10   Dated: November 16, 2017

11                           By: /s/David J. Cohen  
12                           DAVID J. COHEN, ESQ.  
13                           Attorneys for Defendant **Shaun A. Kirkpatrick**

14           **IT IS SO ORDERED.**

15   Dated:

16                           THE HONORABLE NATHANAEL M. COUSINS  
17                           UNITED STATES MAGISTRATE JUDGE